

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BLUDGEON RIFFOLA LTD.,

Plaintiff,

v.

ALI GEGE STORE, et al.,

Defendants.

Case No. 21-cv-02525

Judge Gary Feinerman

Magistrate Judge Beth W. Jantz

**PLAINTIFF’S MOTION TO STAY MOTION TO VACATE [96]
OR MODIFY BRIEFING SCHEDULE**

Plaintiff Bludgeon Riffola Ltd. (“Plaintiff” or “Bludgeon Riffola”) by its counsel, moves this Honorable Court to stay defendant Womens Dresses -YIISU’s (“Defendant”) Motion to Vacate Preliminary Injunction Order (“Defendant’s Motion”) [96].

Defendant has had notice of this case and an asset restraint has been in place since at least June 11, 2021. *See* [33] and [36]. On June 20, 2022, an unknown ghostwriter acting on behalf of Defendant (*see* [98]) filed a Motion to Vacate Preliminary Injunction Order [96] to release the restrained funds and move them to China in an effort evade any practical consequences for trademark counterfeiting in the United States. On June 21, 2022, the Court set a briefing schedule on Defendant’s Motion, requiring Plaintiff to respond to the Motion in less than a week by June 27, 2022. *See* [97].

On June 22, 2022, Plaintiff filed its Motion for Sanctions Against Defendant Womens Dresses -YIISU for Committing Fraud on the Court [98] (“Motion for Sanctions”). Plaintiff’s Motion for Sanctions includes a request to strike Defendant’s pleadings, including Defendant’s Motion [96]. *See* [98]. On June 24, 2022, the Court entered and continued Plaintiff’s Motion for Sanctions [98] to July 7, 2022 at 9:00 a.m. *See* [99]. As such, Plaintiff respectfully requests that

the briefing schedule [97] on Defendant's Motion [96] be stayed pending resolution of Plaintiff's Motion for Sanctions [98].

Alternatively, Plaintiff requests that its response to Defendant's Motion be extended until at least July 25, 2022. In Defendant's Motion [96], Defendant argues that the Preliminary Injunction should be vacated due to a lack of personal jurisdiction. On June 6, 2022, the Court granted Plaintiff leave to take jurisdictional discovery regarding Defendant. [95]. On June 10, 2022, Plaintiff promptly served jurisdictional discovery requests on Defendant, with a response deadline of July 11, 2022. As such, if the briefing schedule on Defendant's Motion [96] is not stayed pending resolution of the Motion for Sanctions [98], then Plaintiff requests that its response to Defendant's Motion [96] be due on July 25, 2022 (fourteen days after Defendant's discovery responses are due on July 11, 2022). Given that the asset restraint has been in place for over a year, there is no harm to Defendant in extending the response deadline and requiring Defendant to respond to discovery.

Dated this 24th day of June 2022.

Respectfully submitted,

/s/ Justin R. Gaudio

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of June 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send a “Notice of E-Filing” to the parties of record in this case, including Defendant Womens Dresses -YIISU.

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